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May 4, 2022

**Via ECF**

Honorable Brian M. Cogan  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Shaw-Nae Dixon, et al. v. Bill DeBlasio, et al.**  
**Civil Action No. 1:21-cv-05090-BMC**  
**Our File No. 01016**

Dear Judge Cogan:

As Your Honor is aware, this firm represents plaintiffs in the above referenced matter. Per Your Honor's Order of April 6, 2022, we were (1) to provide a draft Amended Complaint to defendants; and (2) to advise whether defendants consented to the amendment. We provided same to defendants' counsel on April 11, 2022. Yesterday, defendants advised that they do not consent. They gave us no reason. We thus ask that Your Honor permit the amendment without consent.

We thank Your Honor for consideration of the above.

Respectfully yours,

MURRAY-NOLAN BERUTTI LLC

*Ronald A. Berutti*

By: \_\_\_\_\_  
Ronald A. Berutti

RAB:jm

cc: Kerri A. Devine, Esq. (via ECF)